



April 7, 2006

Dear Elaine and Bill:

The following is the RRCI response to the recent letter from Carlisle SynTec Company.

The comments concerning tensile strength and elongation are true for membranes. Carlisle is a manufacturer of EPDM and TPO MEMBRANES and these products are typically characterized by tensile strength and elongation, not low temperature flexibility, a test typically used for coatings. Membranes are often installed by mechanically fastening the membrane to the roof. The membrane is "unsupported", not fully adhered to the substrate. As such, the tensile strength and elongation are appropriate tests. However, as you are aware, coatings are not membranes, and are ALWAYS fully adhered to another substrate such as a membrane, metal, foam or asphalt roof system. Thus, the low temperature flex test, where the coating is applied to a substrate, is more realistic measure of flexibility.

The comment about the coating thickness tied to their willingness to guarantee their product for only 5 years demonstrates either flawed logic or an incorrect commentary on the longevity of the coating they provide. We (the roof coatings industry) have demonstrated over the last 25 years that well-formulated field applied coatings will perform fully satisfactorily for 10, 15, and 20 years over a wide range of roofing substrates.

Finally, the reference to a lack of national standards is unfounded in that, as you well know, ASTM D6083-05 as is referenced in Title 24, clearly is THE standard for Acrylic Roof Coatings. It was an effort by industry (i.e., coating manufacturers), academia, consultants, raw material suppliers and others to ensure that the bar was set high and to provide for valid performance comparison so that testing could not be manipulated.

You both have worked diligently on behalf of the CEC, with manufacturers represented by the RRCI and RCMA, as well as unaffiliated coating manufacturers. The requirements you have already established fully satisfy all the needs of CEC on behalf of the state of California. Thank you for your consideration in this matter.

Sincerely,

Reflective Roof Coatings Institute